

KYLE R. KNAPP (SBN 166597)  
ATTORNEY AT LAW  
916 2<sup>nd</sup> Street, 2<sup>nd</sup> Floor  
Sacramento, CA. 95814  
Tel. (916) 441-4717  
Fax (916) 441-4299  
E-Mail: kyleknapp@sbcglobal.net

Attorney for Defendant  
AGUSTIN GONZALEZ

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 24-CR-00012-KJM
	)	
Plaintiff,	)	
	)	
v.	)	[PROPOSED] ORDER REGARDING
	)	AMENDING SPECIAL CONDITIONS OF
	)	PRETRIAL RELEASE
	)	
AGUSTIN GONZALEZ,	)	
	)	Date: n/a
	)	Time: n/a
	)	Judge: Honorable Sean Riordan
Defendants.	)	
	)	

---

Defendant, AGUSTIN GONZALEZ, by and through counsel, seeks to amend the Court's previously issued Pretrial Release Order issued by the Honorable Allison Claire on July 17, 2024.

United States Pretrial Services officer, Lorena Gallagher, recently contacted counsel and inquired about amending Mr. Gonzalez's release conditions, to remove the location monitoring condition. AUSA Cameron Desmond indicated that she had no objection to that request. On Mr. Gonzalez's behalf, counsel humbly requests that the Second Amended conditions of release be adopted.

1 Attached as Exhibit A to this pleading are the Second Amended Special Conditions of  
2 Release.

3 All other terms and conditions of release would remain in place.

4 Dated: February 7, 2025

/s/ Kyle R. Knapp  
KYLE KNAPP  
Attorney for Defendant  
AGUSTING GONZALEZ

7  
8 **[PROPOSED] ORDER**

9 The request to amend Mr. GONZALEZ's release conditions is GRANTED, and the  
10 Second Amended Special Conditions of Release for Mr. GONZALEZ are hereby adopted.

11 **IT IS SO ORDERED.**

12 Dated: February 12, 2025

13  
14   
15 SEAN C. RIORDAN  
16 UNITED STATES MAGISTRATE JUDGE  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

EXHIBIT A

**SECOND AMENDED SPECIAL CONDITIONS OF RELEASE**

Re: Gonzalez, Agustin  
No.: 2:24-cr-00012-TLN-3  
Date: February 7, 2025

1. You must report to and comply with the rules and regulations of the Pretrial Services Agency;
2. You must report in person to the Pretrial Services Agency on the first working day following your release from custody;
3. You must reside at a location approved by the pretrial services officer and not move or absent yourself from this residence for more than 24 hours without the prior approval of the pretrial services officer;
4. You must cooperate in the collection of a DNA sample;
5. You must restrict your travel to the Eastern District of California unless otherwise approved in advance by the pretrial services officer;
6. You must not apply for or obtain a passport or any other travel documents during the pendency of this case;
7. You must not possess, have in your residence, or have access to a firearm/ammunition, destructive device, or other dangerous weapon; additionally, you must provide written proof of divestment of all firearms/ammunition currently under your control;
8. You must not use or possess any narcotic drug or other controlled substance without a prescription by a licensed medical practitioner; and you must notify Pretrial Services immediately of any prescribed medication(s). However, medicinal marijuana prescribed and/or recommended may not be used;
9. You must not associate or have any contact with co-defendants unless in the presence of counsel or otherwise approved in advance by the pretrial services officer;
10. You must report any contact with law enforcement to your pretrial services officer within 24 hours